

SECTION 4

VERIFICATION

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VERIFICATION OF ELIGIBILITY FOR SCHOOL MEALS

Definition

7CFR245.2(m)

•Verification is confirmation of eligibility for free and reduced-price meals under the National School Lunch Program or School Breakfast Program. Verification **MUST** include either confirmation of income eligibility and/or confirmation that the child is eligible to receive Food Stamps (FS), Cash Assistance (CA), or is eligible to participate in the Food Distribution Program on Indian Reservations (FDPIR). At State or local discretion, verification may also include confirmation of any other information on the application, which is required as a condition of eligibility.

Exemptions from

Verification

7CFR245.6a(a)(5)

- Verification efforts are **not required for**:
 - All homeless, runaway, and migrant children are categorically eligible for free meals once identified by a homeless education liaison, shelter director, migrant education coordinator, or other appropriate official. Once identified, such children do not have to submit an application to receive free meals and **are not** subject to verification.
 - Children directly certified under direct certification procedures **are not** subject to verification.
 - RCCIs, with the exception of those who have day students in attendance **are not** subject to verification. Day student applications must be verified.
 - Schools participating in the Special Milk Program and do not collect income applications **are not** subject to verification.

(Note: Schools may choose not to count applications for children in split-session kindergarten programs participating in the Special Milk Program in a school where all remaining grades participate in the SBP and/or NSLP when determining the verification sample size)
 - Local Education Agencies (LEA) in which schools are participating in Special Assistance Provision 2 and/or Provision 3 and are operating a NON-base year **are not** subject to verification. Note: Special Assistance sponsors operating a BASE year school **are** required to complete verification procedures.

General Requirements

7CFR245.6a(a)
Child Nutrition and
WIC Reauthorization
Act of 2004
Public Law 108-265
CN # 24-05
CN # 47-05

- Annually, each Local Education Agency (LEA) MUST select and verify a sample of applications approved for benefits, **excluding** all directly certified children and **homeless/migrant/runaway** eligible children.
- LEAs MUST use the Standard Sampling Method, except those who qualify for one of the Administrative Relief Methods (Random or Focused Sampling).
- The required sample size is based on the total number of approved **applications** on file as of **October 1**, regardless of whether the LEA utilizes the Standard Sampling Method or one of the Administrative Relief Methods (Random or Focused Sampling).

NOTE: An application is counted as one application regardless of whether it is a multi-child application (household application) or an application for one child. The sample size depends on the number of paper applications, not the number of children represented on each application. A multi-child application counts as one application in calculating the sample size. When calculating sample sizes, all fractions or decimals MUST be rounded upward to the nearest whole number.

- Under the **Standard Sampling Method**, the LEA MUST verify a minimum of the lesser of 3 percent or 3000 of the total number of approved applications *selecting from error-prone applications first (within \$100 per month or \$1,200 per year)*, **excluding** all directly certified children and **homeless/migrant/runaway** eligible children.
- Under the **Administrative Relief Methods**, the LEA MUST meet specific criteria to qualify for one of the two following methods:
 - **Random Sampling Method**, the LEA MUST verify a minimum of the lesser of 3 percent or 3000 of the total number of approved applications *selected randomly*, **excluding** all directly certified children and **homeless/migrant/runaway** eligible children.
 - **Focused Sampling Method**, the LEA MUST verify a minimum of:
 - (1) the lesser of 1 percent or 1,000 of the **total** number of approved applications (both income and case number). Income applications must **first** be *selected from error-prone applications (within \$100 per month or \$1,200 per year)*, **excluding** all directly certified children and **homeless/migrant/runaway** eligible children.
PLUS
 - (2) the lesser of .5 percent (one half of 1 percent) or 500 of the total number of FS, CA, FDPIR case number eligible applications.

NOTE: If all children listed on an application are directly certified and a case number or income application is on file, that application should not be counted within the total.

- The LEA MUST complete verification of the minimum required sample size by **November 15th**.
- The LEA must collect and report the number of students who were terminated as a result of verification, but who were reinstated as of **February 15th**.
- All LEAs must submit a Verification Report by **March 1st** through ADE's Common Logon.
- Failure to submit Verification Report by **March 1st** through ADE's Common Logon may result in claims and commodities being placed on hold.
- Verification MUST take place *after* the application has been approved, even if the LEA required households to submit documentation of eligibility with the application.
- See Appendix F for a sample Verification Schedule.

Implementation 7CFR245.6a(a)

- Although the required sample size under both Standard and Administrative Relief Sampling is based on the number of approved applications on file as of October 1, LEAs may begin verification prior to this date. LEAs may, based on experience, project the number of approved applications that they anticipate will be on file as of October 1. However, the LEA MUST compare this estimate with the actual number of applications on file as of October 1 and increase the sample size if the total number of approved applications on file exceeds the estimate.
- **The LEA has an obligation to verify all questionable applications.** However, any verification that is done “for cause” must be done in addition to the sample required and may not count toward meeting the requirements of the sample size.
- The LEA MUST complete the verification process for all households that have been **notified of their selection of verification** and have been asked to submit verification information. For example, the LEA cannot select five percent of the applications on file and notify those households of their selection with the hopes of getting three percent to respond to fulfill the verification requirement. The LEA MUST follow-up with any household notified of their selection if the household does not respond.
- **When calculating *sample sizes*, round all fractions or decimals upward to the nearest whole number.** (Calculate to three decimal places and round up to the nearest whole number.)

- **LEAs MUST conduct a confirmation review of ALL applications selected for verification prior to conducting any other verification activity.** The review must be completed by an individual other than the individual who made the initial eligibility determination. This person will be the confirming official and must sign and date the office use only section of the application following review of the applications selected.

The Confirmation Review may be completed in one of two ways:

1. The Confirmation Review may be conducted immediately after the initial eligibility certification is completed. This would be a good option for schools that already have a policy of double checking all eligibility certifications.
2. The Confirmation Review may be conducted as part of the verification process and only applications selected for verification would have a Confirmation Review conducted. When a Confirmation Review is completed as part of verification the following requirements apply:

Notification of Benefit Changes due to Confirmation Review

- If the Confirmation Review leads to a change in benefits that is a benefit to the household, the LEA should make the change as soon as possible and continue with the verification process.
 - If the Confirmation Review leads to a decrease in benefits for the household, the LEA should proceed with verification before any notice of a change in eligibility status is given. These procedures are designed to avoid a possible unnecessary reduction in benefits.
- A LEA who utilizes a technology-based system when processing applications that demonstrate a high degree of accuracy may receive a waiver, if approved by ADE.
 - The LEA must submit a request for a waiver on school letterhead to their assigned specialist prior to starting the verification process. The request must include the name of software used and an explanation of how the software demonstrates a high degree of accuracy.

- **The LEA is required to make at least one additional attempt to obtain the necessary verification information from households who fail to respond to the initial request for verification information. The individual responsible for the follow-up attempt must sign and date the office use only section (follow-up official's signature) of the application.**
 - The attempt may be made through the mail, by telephone, by email, or through personal contact.
 - LEA must document any attempts and the results.
 - If unable to verify the household's eligibility status after the follow-up attempt(s), the household's benefits must be terminated through a notice of adverse action.
 - LEA may contract with a third party to assist with the required follow-up activity. Any third party is subject to confidentiality requirements.
- LEAs may elect to decline to verify up to 5% of applications selected for verification and replace them with other applications to be verified. LEAs **may not** use this discretion to reduce the overall number of applications they verify, but may use it to continue providing free or reduced-price meals to vulnerable children whose parents are unlikely to respond to the verification request and to increase the verification response rate.
- **LEAs must provide all households selected for verification with a telephone number they may call for assistance. The call must be free to all households in the LEA.**
 - The LEA may establish a toll-free number or allow households to reverse the charges if any households in the school district are outside the local calling area.
 - LEA may provide different telephone numbers for each local calling area within the school district.
 - The household must be able to contact a school or LEA official who can either directly assist them or can refer the caller to a specific person for help.
 - If the household is unable to obtain assistance during their initial call, an LEA or school official must attempt to initiate further contact.

Sampling Requirements

Child Nutrition and
WIC Reauthorization
Act of 2004
Public Law 108-265
CN # 24-05
CN # 47-05
CN # 49-05

Standard Sampling Method

- All Local Education Agencies (LEA), with a few exceptions, must use the Standard Sampling Method to determine the number of applications to verify. See Appendix Q to determine what sampling method to use.

Sample Size Requirement for Standard Sampling (See worksheet, Appendix G)

- The required sample size is *three percent (3%) or 3,000 applications, whichever is less*; however **the sample MUST first be selected from error-prone applications (within \$100 per month or \$1,200 per year).**
- To calculate the minimum required number of error-prone applications to verify using the Standard Sampling Method, follow these simple instructions:

STEP 1 Count the total number of approved Free and Reduced-Price **APPLICATIONS (including case number applications)** on file as of **October 1st**.

NOTE: If all children listed on an application are directly certified and a case number or income application is on file, the application should not be counted within the total.

STEP 2 Multiply the total amount of approved Free and Reduced-Price APPLICATIONS by .03 or 3% (Round all decimals up ex. 3.2 is rounded up to 4).

STEP 3 Compare the result in Step 2 to 3,000. Select the lesser number as the sample size.

STEP 4 Select the required number of applications from **ERROR-PRONE** Applications first.

Standard Sampling Application Selection Process

- **The LEA must first select from error-prone income applications.** Error-prone applications are those that fall within \$100 monthly or \$1,200 annually of the Income Eligibility Guidelines (IEGs) for free and reduced-price meals. An Error-Prone Eligibility Applications chart can be found at: www.ade.az.gov/health-safety/cnp/nslp/verification/
- **If the number of error-prone applications identified does not meet the minimum sample requirement, LEAs must randomly select additional applications from all remaining applications (including FS, CA, FDPIR case number applications) to fulfill the minimum sample size requirement.**

- If there are more applications with monthly income within these limits than needed to meet the minimum sample size, select the sample using any method that is equitable and ensures that the same households will not be selected year after year.
- A minimum of one application must be verified.
- LEAs may elect to decline to verify up to 5% of applications selected for verification and replace them with other applications to be verified. LEAs **may not** use this discretion to reduce the overall number of applications they verify, but may use it to continue providing free or reduced-price meals to vulnerable children whose parents are unlikely to respond to the verification request and to increase the verification response rate.

Administrative Relief Methods

Child Nutrition and
WIC Reauthorization
Act of 2004
Public Law 108-265
CN # 24-05
CN # 47-05

How to Qualify for Administrative Relief

- Administrative Relief Methods are available for LEAs that are able to obtain verification information for a relatively high portion of students selected for eligibility verification. The option to select an Administrative Relief Method, including Random Sampling and Focused Sampling will not be available unless the LEA qualifies by meeting one of the following criteria:

- 1) The LEA must have a non-response rate of less than 20 percent (0-19.9%) from the previous school year verification report results.
- 2) The LEA must report verification results correctly.
- 3) The LEAs must have more than 20,000 children approved by application (excluding direct certification and **homeless/migrant/runaway** eligible children) for free and reduced price meals as of October 1.
 - The LEA must show the verification non-response rate for the previous school year was at least 10 percent lower than the verification non-response rate from the year before.

Non-Response Rate

- Non-response rate is the percentage of households with approved applications that did not respond to verification requests. The non-response rate is calculated from the verification results submitted **by the LEA** through ADE's Common Logon. To find the Non-Response Rate from the previous school year verification results, visit the ADE website at: www.ade.az.gov/health-safety/cnp/verification.
 - A non-response rate of 0% - 19.9% (**sponsors highlighted in green**), indicates the LEA qualifies for Administrative Relief and is eligible to choose the Random Sampling Method or Focused Sampling Method.
 - A non-response rate of 20% - 100%, indicates the LEA **must** utilize the Standard Sampling Method and select from error-prone applications first.
 - **Sponsors may have a non-response rate below 20%, however the verification results included reporting errors (sponsors highlighted in yellow). Sponsors must utilize the Standard Sampling Method and select from error-prone applications.**
 - A blank result indicates the LEA did not submit verification results and is required to utilize the Standard Sampling Method and select from error prone applications.
 - **Fields highlighted in red indicate reporting errors or non-response rates greater than 19.9%.**
- LEAs that qualify for Administrative Relief can choose between the Random

**Random
Sampling
Method**

7CFR 245.6a(a)
CN # 47-05

Sampling Method or the Focused Sampling Method.
Sample Size Requirement for Random Sampling
(See worksheet, Appendix H)

- The minimum required sample size is *three percent (3%) or 3,000, whichever is less, of **all approved applications** (excluding all directly certified children and **homeless/migrant/runaway** eligible children) on file as of October 1.* Each application **MUST** have an equal chance of being selected, including FS, CA, FDPIR and income applications. No attempt may be made to select only those applications approved based on FS, CA, FDPIR eligibility. **Selection of error-prone applications is NOT required when using the Random Sampling Method.**
- To calculate the minimum required number of applications to verify using the Random Sampling Method, follow these simple instructions:

STEP 1 Count the total number of approved Free and Reduced-Price **APPLICATIONS (including case number applications)** on file as of **October 1st**.

NOTE: If all children listed on an application are directly certified and a case number or income application is on file, the application should not be counted within the total.

STEP 2 Multiply the total amount of approved Free and Reduced-Price **APPLICATIONS** by .03 or 3% (Round all decimals up ex. 3.2 is rounded up to 4).

STEP 3 Compare the result in Step 2 to 3,000. Select the lesser number as the sample size.

STEP 4 Randomly select the required number of applications.

Random
Sampling
Application
Selection Process

(1) A selection interval may be used. This can be accomplished by dividing the total number of approved applications on file in the LEA by the sample size to determine the selection interval. If there are 340 applications on file and eleven are required to be verified, $340 \div 11 = 30.9$. In this case, the selection interval is 31. Number all the applications. Randomly select an application from the total approved applications, and then choose every 31st application until eleven (11) applications have been selected.

(2) Another random method of selection would be to put all the applications in a container and draw the required number of applications.

- A minimum of **one** application must be verified.

- LEAs are not required to select a statistically valid random sample. Any selection method in which each application has an equal chance of being selected is sufficient.
- LEAs may elect to decline to verify up to 5% of applications selected for verification and replace them with other applications to be verified. LEAs **may not** use this discretion to reduce the overall number of applications they verify, but may use it to continue providing free or reduced-price meals to vulnerable children whose parents are unlikely to respond to the verification request and to increase the verification response rate.

Focused Sampling Method

7CFR 245.6a(a)
CN # 47-05
CN # 49-05

Sample Size Requirement for Focused Sampling

(See worksheet, Appendix I)

- A minimum required percentage or number of applications approved (**excluding** all directly certified children and **homeless/migrant/runaway eligible children**) based on *income eligibility* MUST be selected for verification **AND** a minimum required percentage or number of case number applications approved (**excluding** all directly certified children and **homeless/migrant/runaway** eligible children.) based on *FS, CA, FDPIR eligibility* MUST be selected for verification.

- For applications approved based on income information:

One percent (1%) of the *total number of all approved applications* in the LEA or 1,000 applications, whichever is less.

NOTE: The calculation includes applications approved based on income eligibility AND those approved based on FS, CA, FDPIR eligibility.

- For applications approved based on FS, CA, FDPIR eligibility:

Half of one percent (.005) of the total number of applications in the LEA approved based on FS, CA, FDPIR or 500 applications, whichever is less.

- To calculate the minimum required number of income applications and the minimum required number of case numbers applications to verify using the Focused Sampling Method, follow these simple instructions:

STEP 1 Count the total number of approved Free and Reduced-Price **APPLICATIONS (including case number applications)** on file as of **October 1st**.

NOTE: If all children listed on an application are directly certified and a case number or income application is on file, the application should not be counted within the total.

STEP 2 Multiply the total amount of approved Free and Reduced-Price **APPLICATIONS (including case number applications)** by .01 or 1% (Round all decimals up ex. 3.2 is rounded up to 4)

STEP 3 Compare the result in Step 2 to 1,000. **Select the lesser number from INCOME applications ONLY to verify.**

NOTE: Do not include FS,CA, FDPIR in the selection.

STEP 4 Count the total number **CASE NUMBER** applications that were approved based on FS, CA, FDPIR eligibility.

NOTE: If all children listed on an application are directly certified and a case number or income application is on file, the application should not be counted within the total.

STEP 5 Multiply this number by .005 (half of 1 percent), Round all decimals up ex. 3.2 is rounded up to 4.

STEP 6 Compare the result in Step 5 to 500. Select the lesser number of applications with a FS, CA, FDPIR case number to verify.

STEP 7 Select the required number of **ERROR-PRONE** income applications (within \$100 per month or \$1,200 per year) to meet the 1% minimum requirement. Select the required number of FS, CA, FDPIR case number applications using any method that is equitable and ensures that the same household is not selected each year.

Focused
Sampling
Application
Selection Process

- Separate the applications into two groups:
 - 1) Applications approved based on household size/income
 - 2) FS, CA, FDPIR case number applications (directly certified and **homeless/migrant/runaway** eligible children are exempt from verification)
*****Keep all FS, CA, FDPIR case number applications for children who submitted an application AND were listed as a match through Direct Certification (Data Entry, Upload File, State Match) separate from other income/case number applications.

- Household/Income Application Selection Process

- Select the minimum required number of **error-prone applications** that were approved based on household size/income information. Error-prone applications are those that fall within \$100 monthly or \$1,200 annually of the Income Eligibility Guidelines (IEGs) for free and reduced-price meals. An Error-Prone Eligibility Applications chart can be found at: www.ade.az.gov/health-safety/cnp/nslp/verification/
- If the number of error-prone applications identified does not meet the minimum sample requirement, LEAs must randomly select additional applications from remaining income applications to fulfill the minimum sample size requirement.
- If there are more applications with monthly income within these limits than needed to meet the minimum sample size, select the sample using any method that is equitable and ensures that the same households will not be selected year after year.
- If the total number of applications containing income information is smaller than the required minimum sample size, verify all income applications.

- Case Number Application Selection Process

- Select the minimum requirement (.5 percent) from the applications approved based on FS, CA, FDPIR eligibility using any method that is equitable and ensures that the same household is not selected each year.

NOTE: Children listed as a match through the Direct Certification System and have a case number/income application on file, should NOT be selected for verification. Direct certification students are exempt from verification.

- **Case Number Search must be utilized to verify Food Stamp and Cash Assistance case number applications. Case Number Search is only an option for those Food Stamp and Cash Assistance case number applications selected for verification. Please refer to page 87 for additional information and the CNP Verification Manual for step by step instructions.**
- A minimum of one FS, CA, FDPIR eligible application and one income application **MUST** be verified when using the Focused Sampling Method.
- LEAs may elect to decline to verify up to 5% of applications selected for verification and replace them with other applications to be verified. LEAs **may not** use this discretion to reduce the overall number of applications they verify, but may use it to continue providing free or reduced-price meals to vulnerable children whose parents are unlikely to respond to the verification request and to increase the verification response rate.

**Standard
Sampling/
Administrative
Relief Methods
(Focused/
Random
Sampling) :
Advantages and
Disadvantages**

- LEAs that qualify for Administrative Relief can choose between Random or Focused Sampling.
- LEAs that do not qualify for Administrative Relief are required to use the Standard Sampling Method.
- Standard Sampling and Focused Sampling targets verification efforts on applications with a high likelihood of containing errors; that is, households providing income information on the application and reporting income just below the maximum eligibility level.
- It takes longer to select applications for verification using standard and focused sampling as opposed to random sampling, but the focused sampling method requires verification of less than half as many applications as standard sampling.
- Standard, Random, and Focused Sampling are all nondiscriminatory.

**Household
Notification of
Selection for
Verification**

7CFR245.6a(a)(2)
CN # 15-05
CN # 47-05

- When a household is selected for verification and is required by the LEA to submit documents or other forms of evidence to document eligibility, the household **MUST** be sent a notice/letter informing them of their selection and of the types of information acceptable to the LEA. (See Appendix J-1 and J-2.) The letter/notice **MUST** include the following:
 1. Notification that the household has been selected for verification
 2. A statement that the household **MUST** provide the social security number for each adult household member or indicate that a household member does not have a social security number
 3. A Privacy Act statement
 4. The types of acceptable information that may be provided to confirm current income, include: pay stubs, award letters from welfare departments, social security and support payment decrees from courts
 5. Instruction that the household should submit papers that show income at the time they applied for benefits. If the household does not have this information, they can submit papers from the time of application up to time of verification
 6. The household may provide proof (a FS or CA case number or FDPIR documentation) that the child is a member of a currently certified Food Stamp/ FDPIR/ CA household instead of providing income information and social security numbers of adult household members (**Food Stamp and Cash Assistance Case Numbers MUST be verified through CNP Direct Verification Case Number Search**)
 7. Information **MUST** be provided by a date as specified by the LEA. The LEA must conduct at least one follow-up attempt if the family does not respond. If the family does not respond following the follow-up attempt, the LEA must terminate benefits
 8. The name and **toll free telephone number** of a school official who can answer questions and provide assistance
- When the LEA uses agency records to verify eligibility, the letter/notice of selection is *NOT* required since the household will not have to provide documents and household cooperation will not be necessary.

VERIFICATION METHODS

Written Evidence

7CFR245.6a(b)(1)

- Written evidence is the primary source of eligibility confirmation for all households, including FS, CA, FDPIR households.
 - Written evidence will most often include pay stubs from employers or award letters from welfare departments or other government agencies submitted by the household to the verifying officials as confirmation of eligibility.
 - Acceptable written evidence for income eligible households contains the name of the household member, amount of income received, frequency received and the date. (See Appendix K).
 - Acceptable written evidence for FDPIR households shall contain a written statement from the FDPIR agency that specifies that the child is a member of a household currently receiving benefits.
 - Households may submit FS or CA case number information, however LEAs are required to verify the case number using CNP Direct Verification Case Number Search to determine if the case number is valid for the child(ren).

Collateral Contacts

7CFR245.6a(b)(2)

- A collateral contact is a person outside of the household who is knowledgeable about the household's circumstances and can give confirmation of a household's income or FDPIR status.
 - Collateral contacts include employers, social service agencies, migrant workers' agencies, and religious or civic organizations.
 - The verifying official should request a collateral contact *only* in cases when the household has not been able to provide adequate written evidence.
 - The verifying official **MUST** give the household the opportunity to designate the collateral contact. However, the verifying official may select a collateral contact *if* the household fails to designate one, or designates one, who is unacceptable to the verifying official. In either case, no contact may be made without first notifying the household and obtaining their permission (Appendices L, M).
 - All collateral contacts are to be documented, dated and initialed.

**Agency
Records**
7CFR245.6a(b)(3)

- A household's eligibility may be confirmed through the use of information maintained by other government agencies to which the SA, LEA or school has legal access. Although USDA regulations do not require that households be notified of selection when verification is made through agency records, such agencies may have their own notification requirements.
- One source of agency records is the *wage and benefit information* maintained by the State employment agency, if that information is available to the verifying official. Such records are State records, and State law governs the release of information maintained by State employment offices.
- When using agency records, the LEA should request information for the most recent month available. *Households which dispute the validity of income information acquired through systems of records MUST be given the opportunity to send more recent income information during the 10-day period of advance notice of adverse action.*

**Direct
Verification**
Child Nutrition and
WIC Reauthorization
Act of 2004
Public Law 108-265
CN # 24-05
CN# 31-05

- Direct Verification is the process of using data maintained by other programs or agencies, including Medicaid, or the State employment agency to verify eligibility for free or reduced-price meals for applications selected for verification without having to contact the household.
- Arizona Direct Verification includes the following programs:
 - 1) Food stamps
 - 2) FDPIR
 - 3) State TANF/Cash Assistance
- LEAs have the option of contacting the Indian Tribal Organization (ITO) for FDPIR case number applications, however it is required that LEAs conduct a case number search (Food Stamps & Cash Assistance Case Numbers) utilizing the automated direct verification system created by the Arizona Department of Education.

**Verifying Food
Stamp & Cash
Assistance Case
Number
Applications**

- Arizona Department of Education hosts a secure website that enables school districts and other approved entities to query the Department of Economic Security eligibility database over the internet. LEAs can verify the eligibility without having to contact the household by entering a Food Stamp or Cash Assistance case number into the database. Case Number Search is only an option for those Food Stamp and Cash Assistance case number applications selected for verification.

- LEAs will utilize Case Number Search if one of the following situations occur:

- 1) The Standard Sampling size does not meet the minimum requirement selected from Error-Prone applications and must randomly select additional applications. Additional applications may include Food Stamp and/or Cash Assistance case number applications.
- 2) The LEA using the Random Sampling Method randomly selects Food Stamp and/or Cash Assistance case number applications to meet the minimum requirement of 3%.
- 3) The Focused Sampling method is utilized and LEAs may be able to verify the required ½% of case number applications using Direct Verification.

- LEAs can access the Direct Verification Case Number Search through ADE's Common Logon. LEAs can simply type the Food Stamp or Cash Assistance case number into a field located on the Direct Verification/Case Number Search web page and a result will indicate Match, No Match, or Pending.

- Results that report "Match" indicate the case number was valid and benefits do not change. **Please note:** If the system indicates that one eligible child is a "Match" then ALL children in that child's household are verified.
- Results that report "No Match" indicate the case number was invalid. If the system indicates that ALL eligible children are a "No Match" the LEA is required to send a notification of verification to the family requesting income documentation.
- Results that report "Pending" are still in process. If the system indicates that ALL eligible children are "Pending" or a combination of "Pending" and "No Match" the LEA is required to send a notification of verification requesting income documentation.

LEAs must print results page to document the search was conducted.

Verifying FDPIR Applications

- If a FDPIR application is selected, the LEA has the option, of contacting the Indian Tribal Organization (ITO) directly to obtain confirmation of eligibility.
 - When the ITO indicates a family is “participating” in FDPIR, the LEA must request documentation of eligibility from the ITO and document the contact. Free meal benefits would not change.
 - If the LEA receives a “not participating” confirmation from the ITO, the LEA must send a notification of verification to the family requesting income documentation.
 - If the LEA does not attempt to directly verify the FDPIR application, the LEA must send a notification of verification to the family requesting FDPIR documentation and/or income documentation.
 - The LEA may also *submit the names and case numbers of FDPIR households to the local Indian Tribal Organization office.*
- FDPIR case number applications cannot be verified through Case Number Search.

Refer to CNP Verification Manual for detailed instructions on Verification Reporting and step by step instructions for Case Number Search.

VERIFICATION OF INCOME ELIGIBILITY

Request for Written Evidence

7CFR245.6a(a)(2)

- The notification of selection for verification (Appendix J) **MUST** include a request for the household to submit written evidence of income for all household members and the social security number of each adult household member 21 years of age or older. Income documentation can be submitted from any point in time between on month before the application was certified through the time the household is required to turn in their income documentation for verification. Households indicating zero income **MUST** be asked for a written explanation of how living expenses are met.
- One of the following situations will result:
 - 1) The household submits the required social security numbers and written evidence of current income that confirms the eligibility determination previously made. Verification is considered complete.
 - 2) The household submits the required social security numbers and written evidence of current income that shows that the household's eligibility should be for either a higher or lower level of benefits than the eligibility determination previously made. Verification is considered complete when the letter of adverse action is sent, notifying the household that the child's benefits will be decreased, or the household is notified that the child's benefits will be increased (Appendix N).
 - 3) The household does not respond to the request for income information and/or social security numbers, the LEA **MUST** attempt to follow-up with the household at least once prior to terminating benefits. If the household does not respond following the follow-up attempt, a notice of adverse action must be mailed to the household and benefits are terminated (Appendix N).
 - 4) The household responds and submits insufficient or obsolete written evidence:
 - School officials may contact the household to request the missing written evidence and inform the household that failure to comply or to designate a collateral contact will result in termination of benefits. If the household subsequently cooperates, then either No. 1 or No. 2 above would apply; **OR**
 - School officials may terminate a household's benefits as a result of insufficient documentation. Verification is considered complete when the notice of adverse action is sent to the household (Appendix N).

**Verification
Using Collateral
Contacts**

7CFR245.6a(b)(2)

- When the household has been unable to provide adequate written evidence, the household may identify a collateral contact from which the LEA could obtain the requested information, either orally or in writing.
- A collateral contact would not be expected to provide social security numbers of the adult household members. The household **MUST** still provide these.
- The LEA will examine any written information provided by the collateral contact or evaluate any oral information. Based on this, either situation No. 1 or No. 2 discussed on page 90 would apply.
- If the collateral contact is unwilling or unable to provide the requested information, then the household's benefits will be terminated (Appendix N).

**Verification
Using Agency
Records**

7CFR245.6a(b)(3)

- A household's eligibility may be confirmed through the use of information maintained by other government agencies to which the LEA has legal access.
- The LEA will examine the information received from the agency. Based on this review, either situation No. 1 or No. 2 would apply, *except that* households which dispute the validity of the information **MUST** be given the opportunity to provide more recent income information during the 10-day advance notice period of adverse action.

COMPLETION OF VERIFICATION

Completion Date

7CFR245.6a(a)

CN # 24-05

- A Verification Report MUST be completed by **March 1st** of each year through ADE's Common Logon. If the LEA believes that it will not meet this deadline, a written request for an extension MUST be submitted to the SA prior to March 1st. This request MUST then be submitted to FNSRO for approval.
- Verification of an individual application is complete when a household's eligibility for the level of benefits for which it was approved is:
 - confirmed; or
 - changed to a higher level of benefit; or
 - a letter of adverse action has been sent informing the household that benefits will be reduced; or
 - a letter of adverse action has been sent informing the household that benefits will be terminated.

Verification Results

7CFR210.7(b)(v)

- Verification of a household's eligibility for free or reduced-price meals MUST result in one of the following:

- No change in benefit level - The household's current documentation supports the level of benefits for which the household has been approved or the LEA receives a “match/participating” confirmation via Direct Verification.
- Reduction in benefit level - The household's current documentation identifies income too high for the level of benefits for which the child has been approved. Therefore, the household's eligibility MUST be changed accordingly from free to reduced-price, free to paid or from reduced-price to paid.

The LEA is unable to Directly Verify the application and the household provides income documentation that reduces the level of benefits. Therefore, the household's eligibility MUST be changed accordingly from free to reduced-price or free to paid.

- Increase in benefit level - The household's current documentation qualifies the household for free meals rather than reduced-price meals. Therefore, the household's eligibility MUST be changed from reduced-price to free meals.
- Termination of benefits - Free and reduced-price benefits MUST be terminated for households that do not respond to verification efforts or whose current documentation does not support eligibility for either free or reduced-price meals. LEAs must attempt to follow-up with verification non-respondents at least once. Benefits will change from free to paid or from reduced-price to paid.

The LEA is unable to Directly Verify the application and the family does not provide documentation. LEAs must attempt to follow-up with verification non-respondents at least once. Benefits will change from free to paid or from reduced-price to paid.

- If verification results in a change in benefit level or termination, the change MUST be extended to *all* children in the household who were determined eligible by information that no longer supports the benefit level.
- If verification results in higher benefits (e.g., a child who is moved from the reduced-price to free category), this change is effective immediately and MUST be implemented within 3 operating days. Parents should be notified in accordance with the LEAs standard procedures for notifying households of approval for benefits.
- LEAs must report the verification results by student and by application. Refer to the CNP Verification Manual for detailed instructions on verification reporting.

**Notification of
Adverse Action**
7CFR245.6a(e)

- All households for whom benefits are to be reduced or terminated **MUST** be given 10-calendar days advance notice of the change. The first day of the 10-day period is the day the notice is sent.
- The notice (Appendix N) **MUST** advise the household of the following:
 - the change in benefits,
 - the reasons for the change,
 - that an appeal **MUST** be filed within the 10-day advance notice period to ensure continued benefits while awaiting a hearing and decision,
 - the instructions on how to appeal,
 - that the household may reapply for benefits at any time during the school year with proper documentation and/or valid FS/FDPIR/CA case numbers, and
 - that Food Stamp/FDPIR/CA households may submit an application containing household names and income information and provide written evidence of current household income and the social security numbers of adult household members.
- When a LEA provides free meals to all students (i.e. non-pricing programs), an advance notice of adverse action need not be sent as the student will continue to receive free meals despite the change in status. All meals must be claimed in the correct category for which the student is eligible.

**Benefits During
Appeal of
Verification
Results**
7CFR245.7(b)(1)

- When a household appeals a reduction or termination of benefits within the 10-calendar-day advance notice period, the LEA **MUST** continue to provide the benefits for which the child was originally approved until a final determination is made. The LEA may continue to claim reimbursement at that level during this period.
- When a household does not appeal a reduction or termination of benefits during the 10-calendar-day advance notice period, the actual reduction or termination of benefits **MUST** take place immediately after the 10-day advance notice period.

Hearing Procedure

- The hearing procedure in the LEAs free and reduced-price policy statement **MUST** be followed.
- The hearing official **MUST** be an individual who was not connected with the approval or verification process.
- The household may request a school conference prior to a formal hearing. Any such conference **MUST NOT** prejudice a later appeal.

Households that Reapply for Program Benefits

- Households affected by a reduction or termination of benefits may reapply for benefits at any time during the school year. **However, those households who have been terminated due to verification that reapply in the same school year are required to submit income documentation or a valid Food Stamp/FDPIR/CA case number at the time of reapplication.** The LEA must verify the households' eligibility *prior to* approval. These are not considered new applications due to the fact that these households did not comply with the verification requirements.
- LEAs must track and report households that were terminated (changed to Paid) due to verification that reapplied and were re-approved on or before February 15th. The information collected must be reported on the verification report found through ADE's common logon.

Recordkeeping

- Documentation, as described below, is useful in demonstrating compliance with the verification requirements when LEAs are reviewed by the State and would also be needed in the case of an applicant's appeal.
- LEAs **MUST** maintain a description of their verification efforts. The description **MUST** include:
 - a summary of the verification efforts, including the selection process and the source of information used, such as the Indian Tribal Organization Office, Case Number Search, wage stubs and collateral contacts;
 - the total number of applications on file as of October 1;
 - the number of students terminated as a result of verification, but who were reinstated as of February 15th;
 - the sampling method used and the minimum number of applications verified to meet the sampling requirement;
 - reasons for any denial or change of eligibility and the date.
- Either directly on the application or elsewhere, LEAs should keep a full record of:
 - Confirming official's signature and date (on application)
 - dates notices were sent;
 - notes on any contacts made;
 - results of verification and dates of any eligibility changes;
 - Follow-up Official's signature and date (on application), if applicable;
 - Follow-up attempts and documentation, if applicable;

- signature of the verifying official;
 - direct verification attempts (case number search results page);
 - copies of all relevant correspondence between the households selected for verification and the LEA or school;
 - any additional information necessary to show the efforts made by the LEA to meet the verification requirements; and
- If the application is verified by documents submitted by the household, the LEA MUST retain either:
 - 1) all documents submitted by the household;
 - 2) Reproductions of those documents; or
 - 3) In cases where the actual documents or photocopies cannot be kept, the verifying official MUST make a written record of the documents submitted by the household including the type of document (ex: wage stubs or letter from an employer, income shown on the document, time period of the income and the date of the document).
 - The LEA must maintain copies of all documentation supporting the verification report for a minimum of 3 years.
 - The LEA must have every verified application readily retrievable on an individual school basis and include all documents submitted by the household for the purpose of verifying eligibility.
 - The LEA must retain all relevant correspondence between the household selected for verification and the local education agency.

Additionally, **VERIFICATION REPORTS ARE TO BE COMPLETED ON COMMON LOGON BY MARCH 1st.**